

**IN THE UNITED STATES DISTRICT
FOR THE DISTRICT OF MARYLAND**

Charles Fenner Plaintiff
3308 Fairview Ave Apt B
Baltimore, MD. 21216

FILED _____ ENTERED _____
LOOSE _____ RECEIVED _____
OCT 16 2024 *AC*
AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY
BY _____

10/09/2024

United States District court
District of Maryland
Northern Division
Clerk's Office
101 W. Lombard Street
Baltimore MD. 21201

Re: 1:24-cv-02714-JRR

MOTION TO APPOINT FORENSIC AUDITOR

Plaintiffs respectfully request that this Honorable Court consider the appointment of a forensic auditor to assist in this case. The purpose of this request is to accurately calculate the correct monetary compensation, time and other benefits owed to plaintiffs. The appointment of a forensic auditor is necessary to ensure an

accurate and impartial assessment of the damages due to the plaintiffs. Given the complexity and nature of the work performed by police emergency dispatchers and other similarly situated plaintiffs, this appointment is essential.

There are varying pay rates and other factors in each department covered under the Memorandums of Understanding (MOUs), which further necessitates the expertise of a forensic auditor. In support of this request, plaintiffs cite the case of *Novick v. Shipcom Wireless*, where an internal audit revealed misclassification of employees, leading to a favorable outcome for the plaintiffs. Plaintiffs assert that the defendants' internal audits are not sufficient to prevent discrepancies and ensure compliance with the Fair Labor Standard Act (FLSA).

For the reasons stated above, plaintiffs respectfully request that this Court appoint a forensic auditor whose expertise can ensure an accurate and impartial assessment of the damages due to the plaintiffs.

Respectfully submitted,

Charles Fenner Plaintiff

A handwritten signature in cursive script that reads "Charles Fenner".

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Fenner et al

v.

Baltimore Police Department et al

Case No. 1:24-cv-02714-JRR

CERTIFICATE OF SERVICE

I hereby certify that on October 09 2024, a copy of Motion to appoint
Forensic Auditor

which was electronically filed in this case on N/A, was mailed via Certified mail
first class mail, postage prepaid, to 100 Holliday St, Suite 101
Baltimore, MD. 21202

10/09/2024

Date

Charles Fenner
Signature

Fenner et al

Printed Name and Bar Number

3308 Fairview Ave Apt B

Address

mr.lamont.f@gmail.com

Email Address

Telephone Number

Fax Number